

**IN THE UNITED STATES COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

**MAVIE DENISE YOUNGSON and
TIMOTHY WAYNE YOUNGSON,**

Plaintiffs,

v.

**BOBO TRANSPORTATION, INC.,
OLIM KODIROV,
LOGISTICS BUDDY, LLC and
LOGISTICS BUDDY TRANSPORTATION, LLC,**

Defendants.

**CRYSTINA BASS and
CHRISTOPHER A. BASS,**

Plaintiffs,

v.

**BOBO TRANSPORTATION, INC.,
OLIM KODIROV, PROCTER & GAMBLE
DISTRIBUTING, LLC, PROCTER & GAMBLE
MANUFACTURING COMPANY, PROCTER &
GAMBLE COMPANY, PROCTER & GAMBLE,
LOGISTICS BUDDY, LLC and
LOGISTICS BUDDY TRANSPORTATION, LLC,**

Defendants.

**Civil Action No. 1:17-cv-108
(Consolidated 1:17-cv-69)
REEVES/STEGER**

**DEFENDANT BOBO TRANSPORTATION, INC.'S
RESPONSE TO PLAINTIFFS' (BASS) MOTION TO COMPEL DISCOVERY**

The defendant, Bobo Transportation, Inc., through counsel, submits its response in accordance with the requirements of the Federal Rules of Civil Procedure to the plaintiffs, Crystina

Bass and Christopher A. Bass, Motion to Compel with respect to the Plaintiffs' First Set of Interrogatories and Requests for Production of Documents submitted to this party.

At the time of this filing, this party acknowledges that responses to the subject discovery requests have not been provided to the plaintiffs – this party's counsel remains hopeful that responses will be made before the scheduled Motion hearing on this issue set for February 20, 2018.

With respect to the specific statements outlined in the Motion to Compel, this party would state as follows:

1. Plaintiff: On July 24, 2017, Plaintiffs served Plaintiffs' First Interrogatories and Request for Production to Defendant Bobo (Exhibit 1);

2. Plaintiff: On October 20, 2017, undersigned counsel sent counsel for Defendant Bobo a letter asking if additional time was necessary to respond to discovery, and when such responses would be forthcoming.

RESPONSE: This party's counsel, on October 23, 2017, telephoned counsel for the plaintiffs in response to the referenced October 20, 2017 letter and outlined that, after a search of all file material, it did not have the referenced discovery requests of the plaintiffs to this party and copies of the discovery were requested. Plaintiff counsel's assistant sent the subject discovery requests as outlined in Exhibit 1 to Plaintiffs' Motion by email to this party's counsel on October 23, 2017.

3. Plaintiff: On November 16, 2017, undersigned counsel sent counsel for Defendant Bobo asking for status on responses to the discovery requests found in Exhibit 1, and further advising of the desire to avoid court involvement.

RESPONSE: This party's counsel telephoned plaintiff counsel after receipt of the referenced November letter and provided a status of responding to the discovery and requested an extension to respond to the discovery. Counsel for the plaintiffs by email provided this party an extension to the end of December 2017 to respond to the discovery.

4. Plaintiff: On January 5, 2018, undersigned sent an email to counsel for Defendant Bobo providing additional time, through January 12, 2018, to respond to the discovery requests found at Exhibit 1.

RESPONSE: This party's attorney telephoned plaintiff counsel before January 5, 2018 outlining the efforts and status in responding to the discovery, but the responses still were not complete. Subsequently, plaintiff counsel sent the referenced January 5, 2018 email.

This party's counsel has had at least two phone conversations along with voice mail messages with plaintiff counsel after the stated January 12, 2018 deadline providing the status and continued efforts to respond to the discovery requests.

5. Plaintiff: As of today, no responses have been provided by Bobo.

RESPONSE: At the time of this writing, this party has not provided the subject written discovery responses to the plaintiffs. This party's counsel informed the Court at the Case Management Conference on February 1, 2018 that its written discovery responses had not been provided and there was a pending Motion to Compel. By email dated February 7, 2018 to plaintiff counsel and all counsel of record, this party's counsel outlined that the representative for Bobo Transportation would be available for deposition on May 30, 2018 which was one of the dates designated by plaintiff counsel for defendant depositions.

Respectfully submitted,

s/ Paul L. Sprader

Paul L. Sprader (#014493)

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Attorney for Defendant, Bobo Transportation, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of February, 2018, I electronically filed this document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record below:

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